

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

CBV, INC.,

*Plaintiff*

v.

C.A. No. 1:21-cv-01456-GBW

CHANBOND, LLC,

*Defendant*

and

DIERDRE LEANE and IPNAV, LLC,

*Defendants.*

**STIPULATION AND [PROPOSED] ORDER REGARDING  
SUMMARY JUDGMENT PROCEEDINGS**

WHEREAS, certain claims between Defendants Deirdre Leane, and IPNAV, LLC (“Leane Defendants”) and Defendant ChanBond, LLC (“ChanBond”) have been resolved by a confidential settlement agreement;

WHEREAS, certain claims between Plaintiff CBV, Inc. (“CBV”) and ChanBond have been resolved by a confidential settlement agreement;

WHEREAS, CBV’s Motion for Leave to File a Second Amended Complaint was denied on June 8, 2023 (D.I. 220);

WHEREAS, at the request of the Court, the parties submitted a joint status report on June 16, 2023 (D.I. 224);

WHEREAS, the parties were not able to agree upon a stipulated final judgment in this action and this Court referred the case to Magistrate Judge Burke to pursue ADR (D.I. 230);

WHEREAS, a dispute remains regarding the status of the action given representations of the parties in D.I. 224; and

WHEREAS, the parties have agreed to a schedule with respect to briefing on resolution of the dispute regarding the status of the action given D.I. 224, and for briefing on Motions for Summary Judgment should the Court conclude that claims remain in this action.

NOW THEREFORE, the parties have agreed, by and through undersigned counsel, and subject to the approval of the Court, to the following stipulated proposed order regarding this action:

1. ChanBond does not oppose the foregoing and will not be submitting papers.
2. CBV shall file a Motion for Leave to File Summary Judgment Motions, and a letter brief not to exceed three (3) single-spaced pages addressing the Motion and the case status given D.I. 224 on or before October 9, 2023.
3. Leane Defendants shall file a letter brief not to exceed three (3) single-spaced pages opposing CBV's position regarding the case status given D.I. 224 on or before October 12, 2023.
4. The Court shall either rule upon the papers regarding the case status given D.I. 224 or set a hearing for oral argument on this issue.
5. Should the Court determine that the case shall move forward and that summary judgment is appropriate (the "Summary Judgment Briefing Order"), the following schedule shall govern the parties' submissions:

<b><u>Event</u></b>	<b><u>Date</u></b>
CBV's Motion for Summary Judgment/Opening Brief Due	21 calendar days from entry of Summary Judgment Briefing Order
Leane Defendants' Opposition/Cross-Motion for Summary Judgment Due	21 calendar days from date CBV files Summary Judgment Motion
CBV's Reply/Opposition to Cross-Motion for Summary Judgment Due	7 calendar days from date Leane Defendants file Opposition/Cross-Motion
Leane Defendants' Reply in Support of Cross-Motion for Summary Judgment Due	7 calendar days from date CBV files Reply/Opposition to Cross-Motion

Dated: October 3, 2023

**BUCHANAN INGERSOLL &  
ROONEY PC**

*/s/ Geoffrey G. Grivner*

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*/s/ James H.S. Levine*

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*Attorneys for IPNAV, LLC and Deirdre Leane*

IT IS SO ORDERED, this \_\_\_\_ day of \_\_\_\_\_, 2023.

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UNITED STATES DISTRICT JUDGE  
GREGORY B. WILLIAMS